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May 2, 2024

VIA ECF Filing

Hon. Barbara Moses
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 5/3/2024

MEMO ENDORSED

Re: Matter: Desarrolladora La Ribera, S. De R.L. De C.V. v.
Anderson, et al
Docket No.: 1:24-cv-00067
Subject: Joint Request for Extension of Time to Respond to
Plaintiff's First Amended Complaint

Dear Judge Moses:

As you know, earlier today my firm substituted in as counsel of record for Defendant 5W Public Relations, LLC in the above-referenced action. Pursuant to Rule 2a of Your Honor's Individual Practices we write to request an extension of time for Defendant 5W Public Relations, LLC and Defendant Steve Anderson to Respond to Plaintiff Desarrolladora La Ribera, S. de R.L. de C.V.'s First Amended Complaint, ECF No. 52, in alignment with the proposed schedule described below. Defendants would otherwise be required to respond to the First Amended Complaint on Monday, May 6, 2024.

The reasons for this request are (i) to provide an opportunity for my firm to get up to speed on this matter on behalf as we entered an appearance in this case today, and (ii) the desire of Plaintiff, as well as Defendants 5W Public Relations and Steve Anderson to keep any briefing in response to the First Amended Complaint on a uniform schedule.

Accordingly, Defendant 5W Public Relations, LLC, joined by Plaintiff Desarrolladora La Ribera, S. de R.L. de C.V. and Defendant Steve Anderson request the following deadlines be granted:

- **June 5, 2024** – Deadline for Defendants 5W Public Relations, LLC and Steve Anderson to answer or otherwise Respond to the First Amended Complaint.

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The Honorable Justice Barbara Moses
May 2, 2024
Page 2 of 2

- **July 8, 2024** – Deadline for Plaintiff Desarrolladora La Ribera, S. de R.L. de C.V. to respond to any motions, responsive pleadings, or counterclaims asserted or reasserted by all Defendants ~~SW Public Relations and Steve Anderson~~ in response to the Amended Complaint.
- **July 29, 2024** – Deadline for defendants' reply briefs as to any motions, responsive pleadings, or counterclaims asserted or reasserted by plaintiff in response to the amended complaint.

Counsel has conferred with attorneys for the other parties prior to the filing of this letter request. Counsel for Plaintiff Desarrolladora La Ribera, S. de R.L. de C.V., and Defendant Steve Anderson join in this request for extension. Counsel for Defendant Amit Raizada takes no position on the extensions sought by the parties with respect to the above described matters.

Thank you for your Honor's consideration.

Christina M. Rieker, Esq.

Respectfully submitted,

/s/ Christina M. Rieker

Application GRANTED, with the modifications noted above.

Plaintiff having filed an amended complaint, the Clerk of Court is respectfully directed to close the motions at Dkts. 39 and 41, which are directed to the original complaint, as moot.

SO ORDERED.



Barbara Moses
United States Magistrate Judge
May 3, 2024